

**RELATORS  
PEOPLE NOT  
POLITICIANS, Et Al.  
PETITION FOR  
PROHIBITION  
EXHIBIT 28**

**IN THE CIRCUIT COURT OF COLE COUNTY, MISSOURI**

PEOPLE NOT POLITICIANS, *et al.*,

Plaintiffs,

v.

MISSOURI SECRETARY OF STATE,

Defendant.

Case No. 25AC-CCo7128

**PLAINTIFFS' SUPPLEMENTAL RESPONSES AND OBJECTIONS TO  
INTERVENOR PUT MISSOURI FIRST'S FIRST REQUESTS FOR  
PRODUCTION TO PLAINTIFFS**

Plaintiffs provide these supplemental responses in response to the Court's order granting the Motion to Compel. Supplemental Responses are identified after each request to the extent a supplemental response is provided.

**General Objections**

In addition to the objections contained in the Motion to Strike and Motion for Protective Order, Plaintiffs object to these Requests for Production to the extent they seek information not relevant to any claim or defense in this action and not proportional to the needs of the case; are overbroad in time, scope, or subject matter; are unduly burdensome or harassing; seek information protected by the attorney-client privilege, the attorney work product doctrine, or other applicable privileges and protections, including those safeguarding confidential campaign strategy, donor information, and the privacy of third-party voters and volunteers; purport to impose obligations beyond those provided by the Missouri Rules of Civil Procedure; seek information equally available from public sources;

or call for legal conclusions, premature expert disclosures, or disclosures governed by the Court's scheduling orders.

This case concerns (1) whether the Secretary of State is authorized to reject the form of a referendum petition sample sheet because the Governor had not yet decided to sign the bill up on which the referendum is being requested at the time when the sample sheet was submitted to the Secretary; and (2) whether a proponent of a referendum petition is required to wait for an approval as to form in order to gather signatures in support of a referendum petition. See gen. Am. Pet.. Discovery into Plaintiffs' internal campaign governance, donor or vendor relationships, volunteer identities, signature-gathering totals, and individual signed petition pages is not relevant to those narrow questions and raises serious confidentiality and privacy concerns.

To the extent any Request seeks personally identifying information of signers, volunteers, or low-level staff, Plaintiffs object on grounds of privacy, undue burden, and potential chilling of core political speech and association, and will not produce such information. Plaintiffs further object to producing documents reflecting nonpublic campaign strategy, vendor contracts, or internal analyses.

### **Objections to Definitions and Instructions**

Plaintiffs object to Intervenor's Definitions and Instructions to the extent they impose obligations on Plaintiffs inconsistent with or in addition to the

obligations imposed by the Missouri Supreme Court Rules. Plaintiffs will respond to these requests in accordance with Rule 58.01.

### **Requests for Production**

1. Produce copies of all signed petition pages for the referendum petitions as referred to as Exhibit A to the Plaintiffs' First Amended Petition for Declaratory Judgment and Injunctive Relief filed in the above-captioned matter which were signed before September 28, 2025.

**RESPONSE:** Plaintiffs object to this request because it seeks documents which are irrelevant to the narrow legal issues regarding the Secretary's form-review authority under Missouri Law. Plaintiffs further object that this request is overbroad, unduly burdensome, and not proportional to the needs of this litigation.

This request also seeks personally identifying voter information and signatures, implicating serious privacy and associational concerns. *See NAACP v. Alabama ex rel. Patterson*, 357 U.S. 449 (1958).

Plaintiffs also object that this request seeks documents equally available (if filed) from the Secretary of State or local election authorities under applicable law. Plaintiffs further object that this request is ambiguous as to what is meant by "signed petition pages for the referendum referred to as Exhibit A to the Plaintiffs' First Amended Petition..." Exhibit A includes a document signed by a single individual document. To the extent something else is requested, Plaintiffs object. Plaintiffs will stand on their objections.

**SUPPLEMENTAL RESPONSE:** Plaintiffs will file "signed petition pages" with Defendant Secretary of State later this week. At that time,

Intervenors may obtain the answer to this question from those business records, as the rule allows.

2. Produce copies of all signed petition pages for the referendum petitions as referred to as Exhibit A to the Plaintiffs' First Amended Petition for Declaratory Judgment and Injunctive Relief filed in the above-captioned matter which were signed after September 28, 2025 but before October 14, 2025.

**RESPONSE:** Plaintiffs incorporate by reference all objections to Request for Production 1 as if fully set forth herein. Plaintiffs will stand on those objections.

**SUPPLEMENTAL RESPONSE:** Same as 1.

3. Produce copies of all of the "approximately 70,200 signatures of support of the referendum petition" as referred to in Paragraph 32 of the Joint Stipulation of Facts filed in the above-captioned matter.

**RESPONSE:** Plaintiffs object to this request because it seeks documents which are irrelevant to the narrow legal issues regarding the Secretary's form-review authority under Missouri Law. Plaintiffs further object that this request is overbroad, unduly burdensome, and not proportional to the needs of this litigation.

This request also seeks personally identifying voter information and signatures, implicating serious privacy and associational concerns. *See NAACP v. Alabama ex rel. Patterson*, 357 U.S. 449 (1958).

Plaintiffs further object that this request is vague as to custodial source, date ranges, and form. Plaintiffs will stand on their objections and not produce signed referendum petition pages.



Subject to and without waiving the foregoing objections, as explained in Plaintiffs' answer to Interrogatory Number 11, Stipulation 32 is the result of a request by the Secretary to provide a number of signatures Plaintiff gathered by certain dates. It was a good faith estimate based on gross and generalized data known to Richard von Glahn. The signatures referenced were not specifically identified at that time and there is no way to recreate a copy of those signatures.

4. Produce copies of all of the "approximately 32,600 signatures of support of the referendum petition" as referred to in Paragraph 29 of the Joint Stipulation of Facts filed in the above-captioned matter.

**RESPONSE:** Plaintiffs hereby incorporate by reference all objections to Request for Production

3. Plaintiffs will stand on those objections.

5. Produce copies of all of the "more than 20,000 signatures of Missouri voters supporting the referendum on House Bill 1" as referred to in Paragraph 57 of the Plaintiffs' First Amended Petition for Declaratory Judgment and Injunctive Relief filed in the above-captioned matter.

**RESPONSE:** Plaintiffs object that this request seeks documents which are irrelevant to any of the issues in this case and improperly invades and chills core political speech. *See NAACP v. Alabama ex rel. Patterson*, 357 U.S. 449 (1958). Subject to and without waiving the foregoing objection, there are substantially "more than 20,000 signatures of Missouri voters supporting the referendum." This request is therefore for all signatures gathered, which Plaintiff will produce to the Secretary of State, in accordance with all statutory

requirements, when the referendum petition is turned in.

**SUPPLEMENTAL RESPONSE:** Same as 1.

6. Produce all copies of signed referendum petitions that have been filed with the Defendant which you claim have been or will be rejected.

**RESPONSE:** None. Plaintiffs have not submitted any signed referendum petitions to Defendant. Referendum sample sheets have been filed and were attached to the Amended Petition as Exhibit A.

7. Produce a copy of the referendum petition or petitions that are being circulated by Plaintiffs or on Plaintiffs' behalf.

**RESPONSE:** Plaintiffs are not aware of who may be circulating referendum petitions and objects to the extent this calls for information or documents outside of their control. Subject to and without waiving the foregoing objection, Plaintiffs answer that Exhibit A contains the referendum petition signature page Plaintiffs are circulating.

**SUPPLEMENTAL RESPONSE:** For clarity, Plaintiffs have circulated the document produced as Exhibit A.

8. Produce any and all copies of any contracts for collection of signatures for the referendum petition or petitions that are being circulated by Plaintiffs or on Plaintiffs' behalf.

**RESPONSE:** Plaintiffs object that this request seeks documents which are irrelevant to the claims and defenses in this litigation. Plaintiffs further object that this request is overbroad, ambiguous,

seeks competitively sensitive commercial information and confidential campaign strategy and vendor terms, and is not proportional to the needs of this case.

Plaintiffs also object to the extent this request seeks documents protected by the attorney-client privilege, work product doctrine, and/or the First Amendment associational privilege.

Subject to and without waiving those objections, to the extent this request seeks “copies of any contracts for collection of signatures. . . that are being circulated by Plaintiffs” no contracts are being circulated. To the extent it requests other documents, Plaintiffs will stand on their objections.

9. Produce any and all copies of any validity report regarding the signatures collected for the referendum petition or petitions that are being circulated by Plaintiffs or on Plaintiffs’ behalf.

**RESPONSE:** Plaintiffs object that this request seeks documents which are irrelevant to the claims and defenses in this litigation. Plaintiffs further object that this request is overbroad, ambiguous, and vague. Plaintiff has no idea what Intervenor is referring to by “any validity report.”

To the extent the request seeks “any validity report regarding the signatures collected. . . that are being circulated by Plaintiffs” no such documents are being circulated. To the extent it seeks other documents, Plaintiffs will stand on their objections.

10. Produce all documents referenced or cited in your Answers to Intervenor’s First Interrogatories to Plaintiffs.



**RESPONSE:** Plaintiffs object that this request is overbroad and duplicative of the Interrogatory requests. Plaintiffs will stand on their objections.

**SUPPLEMENTAL RESPONSE:** Plaintiffs' interrogatory responses rely on the documents stipulated to by the parties (correspondence with the Secretary of State, prior stipulations), which the Intervenor's have previously been provided and which are available for inspection on casenet.

Respectfully Submitted,

**STINSON LLP**

/s/ Alixandra S. Cossette

Charles W. Hatfield, No. 40363

Alixandra Cossette, No. 68114

Alexander C. Barrett, No. 68695

Greta M. Bax, No. 73354

230 W. McCarty Street

Jefferson City, Missouri 65101

Phone: (573) 636-6263

Facsimile: (573) 636-6231

chuck.hatfield@stinson.com

alix.cossette@stinson.com

alexander.barrett@stinson.com

greta.bax@stinson.com